1 2 3 4 5	TODD M. LEVENTHAL, ESQ LEVENTHAL AND ASSOCIATES PLLC. Nevada Bar No. 008543 California Bar No.223577 626 South Third Street Las Vegas, Nevada 89101 (702) 472-8686 leventhalandassociates@gmail.com Attorney for Leonardo Augusto Oliveira San	ntos			
6	UNITED STATI	ES DISTRICT COURT			
7	DISTRICT OF NEVADA				
8					
9	UNITED STATES OF AMERICA,	2.17 00001 IAD CWII			
10	Plaintiff,	2:17-cr-00001-JAD-CWH STIPULATION TO CONTINUE			
12	vs.	SENTENCING AND DISPOSITION FOR Mr. Oliveira Santos			
13	LEONARDO A. OLIVEIRA-SANTOS,	TOTE MAIN ON VOICE SURFICE			
14) Defendant.)				
15)				
16	IT IS HEREBY STIPULATED AND AGREED by and between Defendant, LEONARDO				
17	AUGUSTO OLIVEIRA SANTOS, by and thr	ough his counsel, TODD M. LEVENTHAL, ESQ.,			
18	and the United States of America, by its coun	sel, JOHN PATRICK BURNS, Assistant U.S.			
19	Attorney, that the Sentencing in the above-captioned matter currently set for Monday September				
20	18, 2017 at 11:00a.m. be vacated and continued to at least 30 days at a time convenient for the				
21	court preferably on a Friday.				
22	This Stipulation is entered into for the following reasons;				
23					
24	-	nding that are vital to the sentencing of			
25	Mr. Oliveira-Santos.	de and a supple with the members of the distance of the distan			
26		dy and agrees with the requested continuance.			
2728	3. Mr Leventhal has spoken to JO and he has no objection to this	HN P. BURNS, Assistant United States Attorney,			
20	and he has no objection to this	Continuance.			

1	4.	Mr. Leventhal will commence	IIS vs Bund	dy, et al., on October 10, 2017, and will
	٦.			
2		·	C	sday during Trial. Therefore, it is
3				ncing be set for a Friday within the next
4		30 days if the court is available	.	
5	5.	Additionally, denial of this requ	uest for a con	tinuance could result in a miscarriage
6		of justice.		
7				
8	DATE	ED this 15 th day of September, 20	017.	
9				
10	/s/ Todd N	M. Leventhal		/s/ John Patrick Burns JOHN P. BURNS
11	Counsel for L	EVENTHAL, ESQ. Leonardo A. Oliveira-Santos		Assistant U.S. Attorney
12				
13				
14				
15	Submi	itted By: LEVENTHAL & ASSO	OCIATES, PI	LLC
16				
17			By:	/s/ Todd M. Leventhal
18				TODD M. LEVENTHAL, ESQ.
19				Leventhal & Associates, PLLC Nevada Bar No. 008543
20				California Bar No. 223577 626 S. 3 rd Street
21				Las Vegas, Nevada 89101 T: 702-472-8686
22				<u>leventhalandassociates@gmail.com</u> Attorney for: Leonardo A. Oliveira-
23				Santos
24				
25				
26				
27				
28				

2 3	TODD M. LEVENTHAL, ESQ LEVENTHAL AND ASSOCIATES PLLC. Nevada Bar No. 008543 California Bar No.223577 626 South Third Street Las Vegas, Nevada 89101 (702) 427-8686 leventhalandassociates@gmail.com Attorney for Leonardo A. Oliveira-Santos				
7	UNITED STATES DISTRICT COURT				
8	DISTRICT OF NEVADA				
9					
10	UNITED STATES OF AMERICA,) 2:17-cr-00001-JAD-CWH				
11	Plaintiff,				
12	vs.				
13	LEONARDO A. OLIVEIRA-SANTOS ()				
14 15	Defendant.				
16					
17	FINDINGS OF FACT				
18	Based on the stipulation of counsel, and good cause appearing, the Court finds that:				
19	1. Other issues remain and are pending that are vital to the sentencing of				
20	Mr. Oliveira-Santos.				
21	2. Mr. Oliveira-Santos is in custody and agrees with the requested continuance.				
22	3. Mr Leventhal has spoken to JOHN P. BURNS, Assistant United States Attorney,				
23	and he has no objection to this continuance.				
24	4. Mr. Leventhal will commence U.S. vs. Bundy, et al., on October 10, 2017, and will				
25	not be available from Monday through Thursday during Trial. Therefore, it is				
26	respectfully requested that the current sentencing be set for a Friday within the next				
27	30 days if the court is available.				
28					

1	5. Additionally, denial of this request for a continuance could result in a miscarriage			
2	of justice.			
3	CONCLUSIONS OF LAW			
4	1. For all the above-stated reasons, the ends of justice would be best served by granting			
5	a continuance of the current Sentencing and Disposition Hearing and reset it for a			
6	time after October 16, 2017 at a time convenient for the court. Preferably on a			
7 8	Friday morning.			
9	ORDER			
10	Accordingly, IT IS SO ORDERED that the current Sentencing and Disposition is			
11	vacated and the same is continued and reset for October 27, 2017, at the hour of 9:00 a.m.			
12				
13	DATED this 17th day of September, 2017.			
14	Moder			
15	JENNIFER A.) DORSEY UNITED STATES DISTRICT JUDGE			
16				
17	CERTIFICATE OF SERVICE			
18	I hereby certify that on the 15 th day of September, 2017 a true and correct copy of the,			
19 20	STIPULATION AND ORDER TO CONTINUE TIME FOR SENTENCING AND			
21	DISPOSITION was filed through the CM/ECF filing system and was electronically served to			
2	the following registered addresses on file for this instant case:			
23				
24	John Patrick Burns: <u>John.P.Burns@usdoj.gov</u> , <u>USANV.team2@usdoj.gov</u> ,			
25	veronica.criste@usdoj.gov			
26				
27	/s/ Todd M. Leventhal An Employee of TODD M. LEVENTHAL, ESQ.			
28	LEVENTHAL AND ASSOCIATES, PLLC.			